

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net

Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee Under the Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DEUTSCHE BANK NATIONAL TRUST
11 COMPANY, AS INDENTURE TRUSTEE
12 UNDER THE INDENTURE RELATING TO
13 IMH ASSETS CORP., COLLATERALIZED
14 ASSET-BACKED BONDS, SERIES 2005-7,

15 Plaintiff,

16 vs.

17 OLD REPUBLIC TITLE INSURANCE
18 GROUP, INC.; OLD REPUBLIC NATIONAL
19 TITLE INSURANCE COMPANY; DOE
20 INDIVIDUALS I through X; and ROE
21 CORPORATIONS XI through XX, inclusive,

22 Defendants.

Case No.: 2:20-cv-02009-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTION TO DISMISS [ECF No. 15]**

[First Request]

21 Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee Under the
22 Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7
23 (“Deutsche Bank”) and Defendant Old Republic National Title Insurance Company (“ORNTIC”)
24 (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as
25 follows:

- 26 1. On October 9, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial District
27 Court, Case No. A-20-822776-C [ECF No. 1-1];
28

2. On October 30, 2020, ORNTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On December 10, 2020, ORNTIC filed a Motion to Dismiss [ECF No. 15];
4. Deutsche Bank's deadline to respond to ORNTIC's Motion to Dismiss is currently December 24, 2020;
5. Deutsche Bank's counsel is requesting an extension until January 11, 2021, to file its response to the pending Motion to Dismiss;
6. This extension is requested to allow counsel for Deutsche Bank additional time to review and respond to the points and authorities cited to in the pending Motion;
7. Counsel for ORNTIC does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.DATED this 23rd day of December, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

Lindsay D. Robbins, Esq.

Nevada Bar No. 13474

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

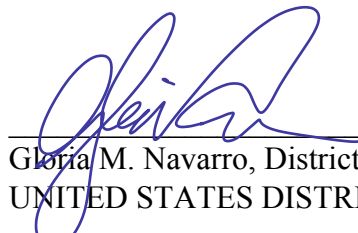
*Attorneys for Plaintiff, Deutsche Bank**National Trust Company, as Indenture**Trustee Under the Indenture Relating to IMH**Assets Corp., Collateralized Asset-Backed**Bonds, Series 2005-7*DATED this 23rd day of December, 2020.EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP/s/ Sophia S. Lau

Sophia S. Lau, Esq.,

Nevada Bar No. 13365

8716 Spanish Ridge Avenue, Suite 105

Las Vegas, Nevada 89148

*Attorneys for Specially-Appearing Defendant**Old Republic Title Insurance Group, Inc.**and Defendant Old Republic National Title**Insurance Company***IT IS SO ORDERED.**Dated this 23 day of December, 2020

 Gloria M. Navarro, District Judge
 UNITED STATES DISTRICT COURT